

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
APR 16 4 31 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KALENKA TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS SCHERER
(OCA/USPS-T1-11(b))

The United States Postal Service hereby provides the response of witness Kalenka to the following interrogatory of the Office of the Consumer Advocate filed on April 5, 2001: OCA/USPS-T1-11(b).

The interrogatory has been redirected from witness Scherer to witness Kalenka for response.

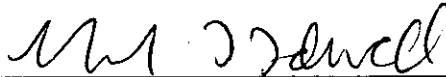
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
April 16, 2001

RESPONSE OF USPS WITNESS KALENKA TO INTERROGATORY
OF THE OFFICE OF THE CONSUMER ADVOCATE
(REDIRECTED FROM WITNESS SCHERER)

OCA/USPS-T1-11.

Please refer to your responses to OCA/USPS-T1-2, where it states that "the majority of presort mailers . . . were exclusively mailing pieces 2 pounds and under."

. . .

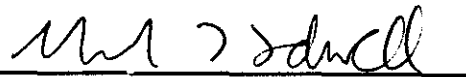
- b. Please confirm that ADP, the only mailer with whom you have discussed the proposed Priority Mail presort discount, has a particular interest in a discount for the \$3.50 one-pound Priority Mail rate. If you do not confirm, please explain.

RESPONSE:

As a user of Priority Mail that could qualify its mail for the proposed presort discounts, ADP has an interest in applying those discounts to as much of its mail as it is practical to do so, including pieces at the one-pound weight increment.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
April 16, 2001